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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	: <b>Chapter 11 Case No.</b>
	:
<b>LEHMAN BROTHERS HOLDINGS, INC., et al.,</b>	: <b>08-13555 (JMP)</b>
	:
<b>Debtor,</b>	: <b>(Jointly Administered)</b>
	:
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**AFFIDAVIT OF AL LAKHANI IN SUPPORT OF DEBTORS' OBJECTION TO  
MOTION OF LEAD PLAINTIFFS IN A CONSOLIDATED SECURITIES  
LITIGATION FOR MODIFICATION OF THE AUTOMATIC STAY**

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF NEW YORK )

Al Lakhani, being duly sworn, deposes and says:

1. I am a Managing Director at the firm of Alvarez & Marsal Dispute Analysis and Forensic Services, LLC ("DAF"), which has offices at 125 Park Avenue, New York, New York 10017. DAF is responsible for managing all e-discovery related matters in ongoing litigations, adversary proceedings, and investigations involving the Debtors.
2. I have worked at the Debtors since September 17, 2008, and my primary responsibilities are to oversee the e-discovery efforts undertaken by the Debtors

and preserve the books and records of the Debtors.

3. The Debtors' document production to the Examiner is by far the Debtors' largest document production to date. As of December 9, 2009, the Debtors have produced over 4,302,721 e-mails to the Examiner in response to over 38 different e-mail requests, relating to 176 custodians, with search terms spanning over 110 pages.
4. The Debtors' production of documents to the Examiner has been, and is being, conducted on an expedited and rolling basis. In an effort to promptly respond to the Examiner's requests, the Debtors agreed to produce documents to the Examiner prior to any review by the Debtors but subject to a claw back agreement that allows the Debtors to claw back documents subsequently determined to be privileged.
5. The ongoing review of documents produced to the Examiner employs approximately forty (40) full-time contact attorneys.
6. The documents requested by Lead Plaintiffs' Motion are preserved on the servers of our e-discovery service provider (physically located in Mountain View, California), as well as preserved at the Iron Mountain electronic storage facility in Boyers, Pennsylvania.
7. The cost of providing the Examiner e-mail production to Lead Plaintiffs would be very high. Assuming standard .tiff production specifications (and 15 pages per document), our e-discovery vendors have estimated that it would cost approximately \$3 million dollars to produce the universe of emails produced to

the Examiner to Lead Plaintiffs. This does not include the cost of attorney review for relevance or privilege determinations.

8. In addition to the e-mail production, the Debtors have provided the Examiner with access to information concerning 13.5 billion transactions over twenty-five different applications, each of which contain multiple databases.
9. The Debtors are also reviewing and producing documents in response to various requests from governmental authorities. I have been informed by our e-discovery service provider that, as of December 9, 2009, LBHI has produced 7,620,665 pages of documents to government agencies in these ongoing civil and criminal investigations.

/s/ Al Lakhani  
Al Lakhani